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January 4, 2021

BY ECF

The Honorable Kevin McNulty
United States District Judge
District Court of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: USA v. Coburn et al., No. 19-cr-120-(KM)

Dear Judge McNulty:

This firm represents Cognizant Technology Solutions Corporation (“Cognizant”) in connection with Defendants Gordon J. Coburn’s and Steven Schwartz’s Subpoenas to Produce Documents, Information, or Objects in a Criminal Case served on Cognizant in the above-referenced matter (the “Subpoenas”). We write in connection with the Government’s letter to the Court, dated December 23, 2020, commenting on the proposed schedule for responding to the Subpoenas and for the parties to present to the Court any issues that they cannot resolve, and defense counsel’s letter, dated December 31, 2020, that, among other things, responds to same. We understand that there is a status conference in this matter scheduled for Wednesday, January 6, 2021. If Your Honor wishes, we will make ourselves available to participate in that status conference, or at any other time that is convenient for the Court, to address any questions regarding the proposed schedule.

Thank you for your attention to this matter.

Respectfully submitted,

s/ Ricardo Solano Jr.
Ricardo Solano Jr.

cc: All Counsel via ECF